## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	)	Chapter 7
Trena Jackson,	)	Case No. 23-02228
,	)	
Debtor.	)	Judge Baer

#### **NOTICE OF MOTION**

To: Trena Jackson, 2835 Gabriella St Unit 411 Downers Grove, IL 60515, via certified US Mail Thomas Springer, Chapter 7 Trustee, via electronic court notice Office of the US Trustee, via electronic court notice See attached service list

PLEASE TAKE NOTICE that on January 26, 2024 at 11:00 a.m., I will appear before the Honorable Judge Baer, or any judge sitting in that judge's place, either in courtroom 615 of the Everett McKinley Dirksen United States Courthouse, 219 S Dearborn St., Chicago, IL 60604 or electronically as described below, and present the Motion to Withdraw as Attorneys, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <a href="https://www.zoomgov.com/">https://www.zoomgov.com/</a>. Then enter the meeting ID and passcode.

**To appear by Zoom using as telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 160 731 2971 and the passcode is 587656. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ David H. Cutler

#### **CERTIFICATE OF SERVICE**

I, David Cutler, certify that I served a copy of this notice and the attached motion on the Chapter 7 Trustee and US Trustee via electronic Court notice, on the Debtor via certified mail, return receipt requested, and on each entity shown on the attached Service List at the address listed on the list via first class US mail, proper postage prepaid on January 10, 2024.

/s/ David H. Cutler

Cutler & Associates, Ltd. 4131 Main St. Skokie, IL 60076 Phone: (847) 673-8600

Case 23-02228 Label Matrix for local noticing 0752-1 Case 23-02228 Northern District of Illinois Eastern Division Wed Jan 10 11:43:43 CST 2024

ADVOCATE HEALTH CARE PO BOX 1123 MINNEAPOLIS, MN 55440-1123

TEANECK NJ 07666-1713

(p) ATEAN ACQUISITIONS ICE age 2 of 6
492C CEDAR LANE SUITE 442

Doc 61

Filed 01/10/24 Entered 01/10/24 11:49:33 Desc Main NATEAS ACQUISITIONS LC6.200 2 of 6 FIRST INVESTORS SERVICING CORPORATION c/o Peritus Portfolio Services II LLC PO BOX 141419 IRVING, TX 75014-1419

U.S. Bankruptcy Court Eastern Division 219 S Dearborn 7th Floor Chicago, IL 60604-1702

AcceptanceNOW

PO Box 10587

Attn: Bankruptcy

5501 Headquarters Drive

Greenville, SC 29603-0587

Affirm, Inc. Attn: Bankruptcy 30 Isabella St, Floor 4 Pittsburgh, PA 15212-5862

Apex 41 c/o Kovitz Shifrin Nesbit 175 North Archer AVe Mundelein, IL 60060-2301

AURORA MEDICAL GROUP, INC

MINNEAPOLIS, MN 55440-1123

PO BOX 1123

Plano, TX 75024-5837 CACH, LLC c/o Resurgent Capital Services

Credence Resource Management, LLC Attn: Bankruptcy

4222 Trinity Mills Road Suite 260

Dallas, TX 75287-7666

Credit One Bank Attn: Bankruptcy Department Po Box 98873 Las Vegas, NV 89193-8873

First Investors Servicing Corporation 3065 Akers Mill Rd SE Suite 700 Atlanta, Georgia 30339-3124

First Premier Bank Attn: Bankruptcy Po Box 5524 Sioux Falls, SD 57117-5524

(p) FIRST NATIONAL BANK OF OMAHA 1620 DODGE ST STOP CODE 3113 OMAHA NE 68102-1593

Genesis FS Card Attn: Bankruptcy Po Box 4477 Beaverton, OR 97076-4401

Genesis FS Card Services Attn: Bankruptcy Po Box 4477 Beaverton, OR 97076-4401

(p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

LVNV Funding, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Lekeshe McKelvin 321 High Ridge Road Hillside, IL 60162-1620

(p) DSNB MACY S CITIBANK 1000 TECHNOLOGY DRIVE MS 777 O FALLON MO 63368-2239

Mariner Finance, LLC 8211 Town Center Drive Nottingham, MD 21236-5904

Mariner Finance, LLC Attn: Bankruptcy 8211 Town Center Drive Nottingham, MD 21236-5904 Merchants Credit Guide Att: Bankruptcy 209 S LaSalle St Ste. 900 Chicago, IL 60604-1443

National Credit Adjusters, LLC Attn: Bankruptcy Department P.O. Box 3023 Hutchinson, KS 67504-3023

Plaza Services, LLC PO BOX 1931 Burlingame, CA 94011-1931 Premier Bankcard, LLC Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud MN 56302-7999

Prestige Financial Services BANKRUPTCY DEPT PO BOX 26707 SLC, UT 84126-0707

Prestige Financial Svc Attn: Bankruptcy 351 W Opportunity Way Draper, UT 84020-1399

RISE Credit Attn: Bankruptcy Po Box 101808 Fort Worth, TX 76185-1808

Case 23-02228 RMK Management, as agent for Apex 41 c/o Kovitz Shifrin Nesbit

175 N. Archer Ave. Mundelein, IL 60060-2301

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Resurper Capite Service age 3 of 6 Attn: Bankruptcy

Po Box 10497 Greenville, SC 29603-0497

Filed 01/10/24 Entered 01/10/24 11:49:33 Desc Main surgent Capital Services and 3 of 6 Santander Consumer USA, Inc., as servicing agent for Alliant Credit Union P.O. Box 961245 Fort Worth, TX 76161-0244

Seed Financial/SeedFi Attn: Bankruptcy 548 Market St., Pmb 33447

San Francisco, CA 94104-5401

(p) SEZZLE INC 251 N 1ST AVE SUITE 200 MINNEAPOLIS MN 55401-1672 Spring Oaks Capital SPV, LLC PO BOX 1216 CHESAPEAKE, VA 23327-1216

(p) SPRING OAKS CAPITAL LLC 1400 CROSSWAYS BLVD STE 100B CHESAPEAKE VA 23320-0207

Total Visa/The Bank of Missouri Attn: Bankruptcy Po Box 85710

Sioux Falls, SD 57118-5710

VILLAGE OF BELLWOOD C/O WAKEFIELD & ASSOCIATES LLC PO BOX 58 FORT MORGAN, CO 80701-0058

Wakefield & Associates Attn: Bankruptcv 10800 East Bethany Drive Ste 450 Aurora, CO 80014-2697

David H Cutler Cutler & Associates, Ltd. 4131 Main St. Skokie, IL 60076-2780

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604-2027

Thomas E Springer Springer Larsen Greene, LLC dba Springer Brown 300 South County Farm Road

Suite G Wheaton, IL 60187-2438 Trena M Jackson 2835 Gabriella St Unit 411

Downers Grove, IL 60515-4004

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Atlas Acquisitions LLC 492C Cedar Lane, Ste 442 Teaneck, NJ 07666

(d) Atlas Acquisitions LLC 492C Cedar Lane, Ste 442 Teaneck NJ 07666

Fnb Omaha P.o. Box 3412 Omaha, NE 68197

Jefferson Capital Systems LLC Po Box 7999 Saint Cloud MN 56302-9617

Macys/fdsb Attn: Bankruptcy 9111 Duke Boulevard Mason, OH 45040

Sezzle Attn: Bankruptcy Po Box 3320 Minneapolis, MN 55403

Spring Oaks Capital, Llc Attn: Bankruptcy P.O. Box 1216 Chesapeake, VA 23327

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(u) Prestige Financial Services Inc. (u) RMF Management as agent for Aper 45 (d) First Investors Servicing Corporation

(d)First Investors Servicing Corporation c/o Peritus Portfolio Services II LLC PO Box 141419
Irving, TX 75014-1419

End of Label Matrix Mailable recipients

Mailable recipients 43
Bypassed recipients 3

Total 46

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	)	Chapter 7
Trena Jackson,	)	Case No. 23-02228
	)	
Debtor.	)	Judge Baer

## **MOTION TO WITHDRAW AS ATTORNEYS**

NOW COMES the Movants, David Cutler and Cutler & Associates, Ltd., and moves this Court for permission withdraw as attorneys for the Debtor pursuant to Local Rule 2091-1. In support of his Motion, the Movants state as follows:

- The Debtor, Trena Jackson's most recent known mailing 2835 Gabriella St Unit 411 Downers Grove, IL 60515.
- 2. Cutler & Associates Ltd have been representing the Debtors in the above-captioned action.
- 3. The Debtor has failed to respond to requests from the Movants to provide requested information to the US Trustee. The Movants have not been able to get a response from the Debtor after repeated requests. As such, Movants cannot adequately represent the Debtors in this case.

WHEREFORE, Cutler & Associates, Ltd., prays for the following relief:

- A. That this Court enter an order granting David Cutler and Cutler & Associates, Ltd. leave to withdraw as attorneys of record for the Debtor from the above-captioned action; and
- B. For such other and further relief as this Court deems equitable and just.

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Dated: <u>January 10, 2024</u>		Respectfully Submitted,
	By:	/s/ David H. Cutler ne of the attorneys for the Debtor

Cutler & Associates, Ltd. 4131 Main St. Skokie, IL 60076 Phone: (847) 673-8600